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Of Attorneys for Non-Parties WCMC Holdings, LLC,  
William Morris Endeavor Entertainment, LLC,  
WME IME, LLC, and WCMC, LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

No. 6:22-cr-00317-MC

Plaintiff,

v.

ANNE HANKINS,

Defendant.

SUPPLEMENTAL DECLARATION OF  
MATTHEW J. KALMANSON IN SUPPORT  
OF VICTIMS' OPPOSITION TO  
HANKINS'S REQUEST FOR RULE 17(c)  
SUBPOENAS

I, Matthew Kalmanson, declare as follows:

1. I am an attorney for non-parties WCMC Holdings, LLC ("Holdings"); William Morris Endeavor Entertainment, LLC; WME IME, LLC; and WCMC, LLC ("Victims"). I make this declaration based on personal knowledge, except where stated herein.

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2. On February 3, 2023, I submitted a Declaration to this Court in support of Victims' Opposition to Hankins's Motion to Issue Rule 17(c) Subpoenas to Victims. The purpose of that Declaration was to let the Court know about the documents produced to Hankins in the arbitration.

3. I am submitting this Supplemental Declaration to clarify one issue that Defendant focuses on her Reply, not because Victims believe it to be relevant to the issues before this Court, but to make sure the record is clear.

4. The VIS states that Victims retained Exiger in "September of 2018" to investigate Hankins's conduct. (VIS, p.4.) Victims' Opposition and my Declaration in support, however, state that Victims produced documents in the arbitration pertinent to the "2019" investigation by Exiger. (Kalmanson Dec, ¶ 13; Opposition at 7.)

5. The declaration of Howard Levine filed with Hankins's Reply supports these statements, as he declares that he received from Victims an October 31, 2018 summary of findings from Exiger, as well as emails involving Exiger from February of 2019. (Levine Dec, ¶ 24(b)-(c).) That said, it would have been more accurate for my declaration to state that the Exiger investigation took place primarily in 2018, although Exiger continued to communicate with Victims and their counsel about these issues into early 2019.

6. If my reference to a 2019 investigation caused confusion, I apologize. Again, however, the VIS itself states only that Victims retained Exiger in "September of 2018," and therefore Hankins could not have filed her Motion for subpoenas because of purported confusion over when the investigation occurred.

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7. Victims are submitting this supplemental declaration only to clarify that statement about Exiger’s investigation. Victims are not conceding the accuracy of any statement made for the first time on Reply about documents produced in the arbitration, any conclusions Hankins’s counsel draws from those documents, and the meaning and relevancy of case-law cited for the first time in Hankins’s Reply. As stated in their Opposition, while Victims wish to exercise their statutory right to be heard at a criminal sentencing, they do not wish to be dragged into a “point-counterpoint” with Hankins’s legal team over these issues in a criminal proceeding brought by the Government.

Respectfully submitted this 10th day of February, 2023.

HART WAGNER LLP

By: /s/ Matthew J. Kalmanson

Matthew J. Kalmanson, OSB No. 041280  
Of Attorneys for Non-Parties WCMC  
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Entertainment, LLC, WME IME, LLC, and  
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